



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

OCT 30 1997

Ref: 8ENF-T

Mr. Jay McCoy
Public Service Company of Colorado-Comanche Station
2005 Lime Road
Pueblo, Colorado 81006

Re: Resource Conservation and Recovery
Act (RCRA), EPA ID# COD980285944
RETURN TO COMPLIANCE LETTER

Dear Mr. McCoy:

This letter is a follow-up to the RCRA Compliance Evaluation Inspection (CEI) performed at the Public Service Company of Colorado-Comanche Station (PSCoCO-Comanche) on September 11, 1997.

The following still outstanding regulatory deficiency was noted during this RCRA inspection:

- PSCoCO-Comanche failed to conduct a hazardous waste determination on 55 gallon drum #R361092-001. This constitutes a violation of 40 CFR 262.11.

Per your laboratory analysis submission of October 20, 1997, and our subsequent review of this information, the Agency has determined that PSCoCO-Comanche Station has returned to compliance.

Although timely compliance has been achieved, please be advised that PSCoCO-Comanche Station is responsible for remaining in compliance with RCRA and/or other applicable Federal or State environmental regulations relating to your business activities, and that this letter does not constitute a bar to enforcement action as a result of conditions which the RCRA inspector did not observe, or conditions found during future Federal, State or joint inspection(s) of your facility.



Your cooperation with this RCRA CEI effort is appreciated. If you have any comments or questions concerning RCRA regulations or this RCRA inspection, please contact me at the address noted above or at (303) 312-6350.

Sincerely,

Randy Lamdin

Randy Lamdin, EPS
Technical Enforcement Program
U.S. EPA Region VIII

cc: Kathy Wahlberg, CDPHE
Linda Jacobson, USEPA

**Public Service®**Public Service
Company of Colorado

October 20, 1997

Comanche Station
2005 Lime Rd.
Pueblo, Co. 81006Randolph R. Lamdin
U.S. Environmental Protection Agency
999 18th Street, Suite 500
Denver, Co.

Dear Randy,

In response to your letter, Ref: 8ENF-T, dated Oct 14, 1997 (item #3).

Attached is the Lab Analysis of the product remaining in the barrel identified as (b) (4). Analysis was unable to determine a product name of the barrel contents. Additional checking was done running a comparison of the identified constituents against an inventory of known products used at Comanche and no match was found. As a result of the analysis, we will dispose of the partial barrel as Hazardous Waste.

Jay McCoy

cc: Olon Plunk
Jim Weller
Fred ArellanoJAY A. MCCOY
Environmental Analyst
Comanche Station**PUBLIC SERVICE
COMPANY OF COLORADO™**2005 Lime Road
Pueblo, Colorado 81006
Telephone 719.549.3710
Fax 719.549.3792
Pager 303.556.0702**RECEIVED**
OCT 28 1997
Office of Enforcement,
Compliance & Environmental
Justice



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

OCT 14 1997

Ref: 8ENF-T

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDMr. Fred Arellano
Public Service Company of Colorado-Comanche Station
2005 Lime Road
Pueblo, Colorado 81006Re: Resource Conservation and Recovery Act
(RCRA), EPA ID# COD980285944, WARNING/
PARTIAL RETURN TO COMPLIANCE LETTER

Dear Mr. Arellano:

This letter is a follow-up to the RCRA Compliance Evaluation Inspection (CEI) performed at the Public Service Company of Colorado-Comanche Station (PSCoCO-Comanche) on September 11, 1997.

The following regulatory deficiencies were noted during this RCRA CEI:

- 1) PSCoCO-Comanche failed to file exception reports to either U.S. EPA or CDPHE for hazardous waste manifests #68175 (10/3/95) and #87354 (11/7/95). These are violations of 40 CFR 262.42(b).
- 2) PSCoCO-Comanche failed to post next to the control room telephone the location of spill control material. This constitutes a violation of 40 CFR 262.34(d)(5)(ii)(B).
- 3) PSCoCO-Comanche failed to conduct a hazardous waste determination on 55 gallon drum #R361092-001. This constitutes a violation of 40 CFR 262.11.

In light of the fact that PSCoCO-Comanche has already returned to compliance on items 1) and 2) noted above (via a fax submission from Safety-Kleen dated 9/12/97 and PSCoCO-Comanche correspondence also dated 9/12/97), only item 3) noted above still needs to be addressed.

You are hereby requested to complete, within thirty (30) calendar days of receipt of this letter, environmental action necessary to bring PSCoCO-Comanche into full compliance with the RCRA hazardous waste/used oil regulations. By no later than the prescribed deadline noted above, please send us analytical



documentation and a brief written conclusion based upon the findings (e.g., hazardous waste, solid waste) which demonstrates that PSCoCO-Comanche has performed an adequate hazardous waste determination in accordance with 40 CFR 262.11. The Agency looks forward to reviewing your submission.

Failure to comply with the aforementioned requirement can result in legal action under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA).

If you have any questions or concerns regarding this matter, please contact me at the address above or at (303) 312-6350.

Sincerely,

Randy Lamdin

Randy Lamdin, EPS
Technical Enforcement Program

cc: Fred Dowsett, CDPHE
Linda Jacobson, USEPA



P 142 092 684



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1991

Sent to		FRED ARELLANO
Street		PSC OF CO-COMANCHE STA
City and State		2005 LIME RD
P.O. Box and ZIP Code		PUEBLO CO 81006
Postage		\$
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, and Addressee's Address		
TOTAL Postage & Fees		\$
Postmark or Date		

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

OCT 15 1997

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

MR FRED ARELLANO
PUBLIC SVC CO OF COLO-COMANCHE STA
2005 LIME ROAD
PUEBLO CO 81006

4a. Article Number

P 142 092 684

4b. Service Type

- ☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

10-17-97

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X Michelle Vigil

8. Addressee's Address (Only if requested and fee is paid)



PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

EPA REGION VIII
HAZARDOUS WASTE MANAGEMENT DIVISION
RCRA COMPLIANCE INSPECTION REPORT

FACILITY NAME: Public Service Company of Colorado
(Comanche Station)

EPA I.D. #: COD980285944

LOCATION: 2005 Lime Road

MAILING ADDRESS: PSCoCO-Comanche
2005 Lime Road
Pueblo, Colorado 81006

FACILITY CONTACT: Mr. Fred Arellano

TELEPHONE: (719) 549-3710

DATE OF INSPECTION: September 11, 1997

NOTIFICATION STATUS: Small Quantity Generator (SQG)

TYPE OF INSPECTION: Compliance Evaluation Inspection (CEI)

PARTICIPANTS: Mr. Fred Arellano (PSCoCO)
Mr. Dave Edmisson (PSCoCO)
Mr. Jay McCoy (PSCoCO)
Mr. Nick Pazzuti (PSCoCO)
Ms. Mindy Trautman (PSCoCO)
Mr. Randy Lamdin (USEPA)

WEATHER: 80 Degrees Fahrenheit

TIME IN: 9:00 A.M.

TIME OUT: 4:30 P.M.

INTRODUCTION

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the Public Service Company of Colorado's Comanche Station (PSCoCO-Comanche) facility. An emphasis was placed upon determining the compliance of the facility with regards to the regulations governing hazardous waste, under the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

FINDINGS

The U.S. EPA inspector arrived at the facility announced at approximately 9:00 A.M. and showed his inspector credentials/ explained the purpose of the RCRA inspection to Mr. Fred Arellano (Maintenance Manager), Mr. Dave Edmisson (Operations Manager), Mr. Jay McCoy (Environmental Analyst), and Mr. Nick Pazzuti (Environmental Auditor). Ms. Mindy Trautman (Enviroservices Manager) arrived shortly after the in-briefing was held.

Following an explanation of the purpose of the inspection, the inspector proceeded with general inquiries about the nature of business at the PSCoCO-Comanche station. Facility representatives stated that the PSCoCO-Comanche station is a coal-fired power plant which produces electricity for public use in Colorado and for private use to such companies as CF&I and West Plains Energy.

From an operational standpoint, PSCoCO-Comanche station employs one-hundred twelve (112) employees (78 in various "blue collar" occupations, 11 in management, 6 administrative, 6 environmental, 5 engineers, 5 instrument control technicians, and 1 station buyer). Following inspector inquiries, facility representatives stated that the station is operational seven (7) days a week, twenty-four (24) hours a day with three (3) shifts being run daily, has been running since 1973, and has two (2) units (boiler/turbine combination) which undergo minor and major maintenance approximately every two (2) years and six (6) years respectively.

Having received PSCoCO-Comanche station background information from facility representatives, the inspector focused upon the following wastestreams generated on-site:

Safety-Kleen spent solvents (for parts washing) are generated out of four (4), thirty (30) gallon units located around the station. The service intervals for these units varies, but it appears that some quantity of hazardous waste is generated a couple of times monthly. This by far is PSCoCO-Comanche station's largest source of hazardous waste generation. This wastestream is being properly managed/recycled by PSCoCO-Comanche/Safety-Kleen in accordance with 40 CFR 262.20(e).

Paint waste generation is minimal. PSCoCO-Comanche station has no spray guns which require cleaning, they hire contractors to do large paint jobs, and latex/epoxy lead-free paints are used for small interior/exterior paint jobs annually. Any paint waste generated from paint spray cans, gallon/multi-gallon containers, etc. is accumulated in one(1) satellite accumulation site location and utilized in a comingled fashion to paint their coal conveyor belt walkway(s). This use satisfies 40 CFR 261.7 (empty containers) and 40 CFR 261.2(e)(1)(ii) (product substitution) irrespective of whether or not the paint waste can even be construed as hazardous waste.

Spent-lead acid batteries are recycled internally to PSCoCO's central warehouse in Denver, Colorado. PSCoCO utilizes a number of different battery recyclers (e.g., Interstate Batteries). This wastestream is being properly managed/recycled by PSCoCO-Comanche in accordance with 40 CFR Part 266 Subpart G and/or 40 CFR Part 273 Subpart B.

Spent nickel-cadmium (NiCad) batteries are accumulated by PSCoCO-Comanche in twelve (12) gallon overpacks and recycled to ENSCO (ARD069748192) in El Dorado, Arkansas. This wastestream is being properly managed/recycled by PSCoCO-Comanche in accordance with 40 CFR Part 273 Subpart B.

PSCoCO-Comanche infrequently generates lab packs from their chemistry laboratory. These small hazardous wastestreams are shipped to various RCRA treatment, storage, and disposal facilities on hazardous waste manifests in accordance with 40 CFR Part 262 Subpart B.

Spent-fluorescent lightbulbs are generated by PSCoCO-Comanche. They are currently being taken to PSCoCO's central warehouse in Denver, Colorado. Preliminary PSCoCO analysis on spent-fluorescent lightbulbs indicates they are non-hazardous waste (NHW). However, PSCoCO is in the process of developing a spent-fluorescent lightbulbs corporate policy, of which U.S. EPA will be afforded a courtesy copy.

Lead abatement (sand blasting) is performed on an infrequent basis at the PSCoCO-Comanche station. From an historical perspective, analyses have indicated that this media is a non-hazardous waste (NHW). PSCoCO-Comanche is currently shipping this wastestream as an industrial waste to CSI in Bennett, Colorado.

Used oil (crankcase oil) and used oil filters from fleet vehicles is not generated at the PSCoCO-Comanche station. Such vehicle maintenance is performed off-site in Pueblo, Colorado. Facility representatives did allude to the generation of some used oil and used oil filters from their three (3) Michigan coal dozers and one (1) front-end loader. This used oil and corresponding used oil filters are being recycled through Safety-Kleen.

Used oil (cutting oils) generated in the PSCoCO-Comanche station machine shop is water-soluble, however, because of inherent contaminants that are introduced through use, it is also being recycled through Safety-Kleen.

Used gear oil, which is generated from various machinery throughout the facility, although typically non-hazardous, is also being recycled through Safety-Kleen.

Spent ethylene glycol (antifreeze), which is generated from four (4) variable frequency drive electronic fans, has been accumulating on-site in a dedicated 55 gallon drum. To date, forty (40) gallons has been accumulated over the last five (5) years. Facility representatives informed the inspector that when the drum becomes full they will properly manage it.

Following the wastestreams generated review, the U.S. EPA inspector requested to review the requisite paperwork for RCRA small quantity generators (SQGs) of hazardous waste, in accordance with 40 CFR 262.34(d)-(f) and 262.44. This paperwork review was conducted between approximately 11:25 A.M.- 1:00 P.M.

The inspector reviewed hazardous waste manifests and land disposal restriction certifications/notices back three (3) years from the date of the inspection. All of this documentation was in order except there were no designated facility signed copies for Safety-Kleen hazardous waste manifests #68175 (10/3/95) and #87354 (11/7/95). Although technically not violations of 40 CFR 262.40(a), these are violations of 40 CFR 262.42(b), because facility representatives informed the inspector that no exception report(s) have ever been filed with either U.S. EPA or CDPHE.

During a review of the 40 CFR 262.34(d)(5)(i)-(iv) requirements the inspector noted that the location of spill control material was not noted on any facility paperwork maintained and/or posted next to the telephone in the control room. This constitutes a violation of 40 CFR 262.34(d)(5)(ii)(B).

Having reviewed all of the requisite paperwork requirements for RCRA small quantity generators (SQGs) of hazardous waste, the U.S. EPA inspector requested a field tour of the PSCoCO-Comanche station. This field tour was conducted between approximately 2:05 P.M.- 3:05 P.M.

During the field tour of the facility the inspector and facility representatives visited the hazardous waste satellite accumulation area, the spill control material storage area,

various areas where the four (4) Safety-Kleen parts washers are being utilized, the central storage area where hazardous waste, solid waste, used oil, and unknowns are kept, the control room, the laboratory, and the maintenance shop. The inspector noted RCRA compliance in all of the aforementioned areas of the facility except the central storage area. The inspector noted a 55 gallon drum (#R361092-001) that appeared to be an unknown. When asked about the contents of this particular drum facility representatives did not know. As such, this constitutes failure to conduct a hazardous waste determination, in accordance with 40 CFR 262.11.

Having completed the field tour portion of the RCRA CEI, the inspector and facility representatives returned to the PSCoCO-Comanche station offices. The U.S. EPA inspector concluded the RCRA CEI by holding an out-briefing with facility representatives and issuing them a copy of the completed U.S. EPA Notice of Inspection. The inspector departed the facility at approximately 4:30 P.M.

CONCLUSION(S)/RECOMMENDATION(S)

Based upon the U.S. EPA inspector's findings, it appears that PSCoCO-Comanche station is in violation of the following RCRA statutory/regulatory requirements:

- 1) Failure to file exception reports to either U.S. EPA or CDPHE for hazardous waste manifests #68175 (10/3/95) and #87354 (11/7/95). These are violations of 40 CFR 262.42(b).
- 2) Failure to post next to the control room telephone the location of spill control material. This constitutes a violation of 40 CFR 262.34(d)(5)(ii)(B).
- 3) Failure to conduct a hazardous waste determination on 55 gallon drum #R361092-001. This constitutes a violation of 40 CFR 262.11.

In light of the nature of the RCRA violations noted above, and the fact that PSCoCO-Comanche station representatives have already returned to compliance on items 1) and 2) above (via a fax submission from Safety-Kleen dated 9/12/97 and correspondence also dated 9/12/97), it is recommended that PSCoCO-Comanche station be issued a RCRA Warning/Partial Return to Compliance Letter which notes all of the violations and gives a stipulated timeframe (e.g., thirty (30) days) for providing U.S. EPA with an adequate analysis which will satisfy item 3) above.

Landy Samdin
Inspector Signature

10/14/97
Date

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION VIII)

One Denver Place, 999 18th St., Denver, CO 80202-2413

PROGRAM

NOTICE OF INSPECTION

<input checked="" type="checkbox"/> Resource Conservation and Recovery Act (RCRA) Public Law 94-580, as amended. <input type="checkbox"/> Toxic Substances Control Act (TSCA) Public Law 94-469, as amended. <input type="checkbox"/> Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Public Law 92-516, as amended.							
Date <i>9/11/97</i>	Inspector # <i>13254</i>	Daily Seq. <i>1 OF 1</i>	Hour IN: <i>0900</i> OUT: <i>1630</i>	CMO Fac.	Facility name <i>PUBLIC SERVICE COMPANY OF COLORADO (COMANCHE STATION)</i>	DUNS # <i>CD980285944</i>	
Fac. Func.	Invest. Type	FATES Reason	RCRA: Gen. <input checked="" type="checkbox"/> Transp. <input type="checkbox"/> TSD <input type="checkbox"/>	Street <i>2005 LIME ROAD</i>			
Facility Representative(s) <i>MR. JAY MCCOY ENVIRONMENTAL ANALYST</i> <i>MR. DAVE EDMISSON OPERATIONS MANAGER</i> <i>MR. FRED ARELLANO MAINTENANCE MANAGER</i> <i>MR. NICK PAZZUTI ENVIRONMENTAL AUDITOR</i> Phone # <i>(719) - (5493710)</i>				City <i>PUEBLO</i>		State <i>CO</i>	Zip <i>81006</i>
Reason for Inspection: Entry by Consent: <input checked="" type="checkbox"/> Warrant: <input type="checkbox"/> <input checked="" type="checkbox"/> To determine the extent of compliance with the above referenced law, which may require the collection of samples, documents, and/or photographs. <input type="checkbox"/> Other (Specify) _____ Violations of above referenced law are suspected from information or complaint. Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>							
Samples, Documents, and/or Photos collected (describe below)						Medium	Date to Lab
1.							
2.							
3.							
4.							
5.							
6.							
Samples requested and received by facility: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes: <input type="checkbox"/> Duplicate. <input type="checkbox"/> Split. <input type="checkbox"/> Photos (To be received when processed.)							
This inspection has revealed the following probable violations of EPA laws or regulations. <i>- FAILURE TO POST NEXT TO TELEPHONE IN CONTROL ROOM LOCATION OF FIRE EXTINGUISHERS AND SPILL CONTROL MATERIAL (i.e., SCHEMATIC)</i> <i>- FAILURE TO CONDUCT HAZARDOUS WASTE DETERMINATION ON 1, 55 DRUM (#R361092-001) IN CENTRAL DRUM STORAGE AREA</i> <i>- 262.20(e)(1)(i) & (2)/268.7(a)(10) REGULATORY DETERMINATION TBD</i> <i>- NO TSD SIGNATURES ON MANIFEST #'S 68175 AND 87354</i>							
The facts established by this inspection will be reviewed by personnel in the EPA Regional Office. A final determination of your facility's compliance with EPA regulations will be made as a result of this review. The review may reveal additional violations.							
Receipt of this Notice of Inspection is acknowledged. <i>Fred Arellano</i> (Signature of facility representative)				Signature of Lead Inspector <i>Randy Landon (U.S. EPA)</i> Assisting Inspectors (EPA/Contr./State) _____ _____			

223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

0-052-04

10/03/95

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. COD 960215944	Manifest Document No. 08175		2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address PUBLIC SERVICE CO OF COLO 2035 LINE RD POEBLO CO 81006 ATTN BOB ARRIAGO 719 546-7865					A. State Manifest Document Number			
					B. State Generator's ID			
4. Generator's Phone			5. Transporter 1 Company Name SAFETY-KLEEN CORP.		6. US EPA ID Number COD 000716639			
7. Transporter 2 Company Name			8. US EPA ID Number		C. State Transporter's ID			
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 2841 EAST FOURTH ST POEBLO, CO 81001			10. US EPA ID Number COD 000716639		D. Transporter's Phone 719 544-1338			
					E. State Transporter's ID			
					F. Transporter's Phone			
					G. State Facility's ID			
					H. Facility's Phone 719 544-1338			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HM WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D039)(ERG27) 6.7LBS/GAL					1	16	g	D039
b.								
c.								
d.								
J. Additional Descriptions for Materials Listed Above					K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information 9540 86217684 268175 0-052-04-7126 01 IF UNDELIVERABLE, RETURN TO GENERATOR FOR RECYCLE EMERGENCY RESPONSE 4708-888-4680 24HR. SKDOTS A: 95653 B: C: D:								
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.								
Printed/Typed Name Pete Tudisak					Signature <i>[Signature]</i>		Date Month Day Year 10 3 95	
17. Transporter 1 Acknowledgement of Receipt of Materials					Signature <i>[Signature]</i>		Date Month Day Year 10 3 95	
18. Transporter 2 Acknowledgement of Receipt of Materials					Signature		Date	
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.								
Printed/Typed Name					Signature		Month Day Year	

INSTRUCTIONS FOR COMPLETION OF THIS FORM, REFER CODE OF FEDERAL REGULATION, 40, PART 262.20.

11/07/95

8-002-04

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-95

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. COD 960256944	Manifest Document No. 67354		2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address PUBLIC SERVICE CO OF COLO 2808 LINE RD PUEBLO CO 81006 ATTN: BQS ARRIVAL					A. State Manifest Document Number		
4. Generator's Phone (719) 545-7865					B. State Generator's ID		
5. Transporter 1 Company Name SAFETY-KLEEN CORP.			6. US EPA ID Number COD 000716639		C. State Transporter's ID		
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone 719 544-1336		
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 2841 EAST FOURTH ST PUEBLO, CO 81001			10. US EPA ID Number COD 000716639		E. State Transporter's ID		
					F. Transporter's Phone		
					G. State Facility's ID		
					H. Facility's Phone 719 544-1336		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. HM WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PG111 (0039) (E46427) 6.7 LBS/GAL				2 DM	33	6	0039
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information 9545 87614699/587354 6-052-04-7126 01 IF UNDELIVERABLE, RETURN TO GENERATOR FOR RECYCLE EMERGENCY RESPONSE 706-888-4666 24HR. BKDGTW A: 06653 B: C: D:							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name David Hordinas				Signature [Signature]		Date 11/7/95	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature [Signature]		Date 11/7/95	
Printed/Typed Name David Hordinas				Signature [Signature]		Date 11/7/95	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.							
Printed/Typed Name				Signature		Date Month Day Year	

INSTRUCTIONS FOR COMPLETION OF THIS FORM. REFER CODE OF FEDERAL REGULATIONS, 40, PART 262.20.

RECEIVED

SEP 12 1997

Office of Enforcement,
Compliance & Environmental
Justice

Safety-Kleen Corporation
2841 East Fourth Street
Pueblo, Colorado 81001
Office (719) 544-1338
Fax (719) 545-9016

FACSIMILE TRANSMISSION

DATE: 9/12/ 97

NUMBER OF PAGES INCLUDING COVER SHEET: 4

DELIVER TO: Jay McCoy

NAME OF FIRM: PSLO

MESSAGE: _____

cc: Randy Landin-USEPA

FROM: Brian Jacobson





VIA FAX - Hard copy will follow

September 12, 1997

Mr. Jay McCoy
Public Service Company of Colorado
2005 Lime Road
Pueblo, CO 81006
Fax Number: 719/549-3792

RE: Requested Documents from Safety-Kleen Corp. COD000716639
for PSCo, Comanche Plant (COD980285944)

Please find enclosed copies of the manifests for your facility that you requested. We located all documents you requested. Copies of these documents will be forwarded to Mr. Lamdin of US EPA as you requested.

As we discussed in our conversation today, the provisions of the tolling agreement (a.k.a. reclamation agreement) are listed on the reverse side of each service document used to pick up your parts cleaning solvent waste. These tolling agreements are valid for the one service only. In the instance of the 8/9/95 pick-up, Lee Watson of PSCo signed the service agreement acknowledging that the waste would be picked up by Safety-Kleen, transported by Safety-Kleen vehicles, and returned to the market as parts cleaning solvent.

If you have any questions, or require any additional assistance, feel free to contact me at 303/783-0531, or Jerry Gallo at 544-1338.

Sincerely,

Brian T. Jacobson
Senior EHS Manager

Jerry Gallo
Branch Manager

Enclosures

cc: Randy Lamdin, US EPA Region VIII, 303/312-6350 (fax)

2841 EAST FOURTH STREET

PUEBLO, CO 81001

719/544-1338

PRINTED ON RECYCLED PAPER

P.02/04

719 545 9016 TO 130333126409

SEP 12 '97 09:26 FR SK-PUEBLO

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 0000000000	Manifest Document No. 000000	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address PUBLIC SERVICE CO OF COLO 2000 EISE RD DENVER CO 80202				A. State Manifest Document Number		
4. Generator's Phone (714) 346-1300				B. State Generator's ID		
5. Transporter 1 Company Name SAFETY-KLEEN CORP.		6. US EPA ID Number 0000000000		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (714) 346-1300		
9. Designed Facility Name and Site Address SAFETY-KLEEN CORP. 2041 EAST FOURTH ST DENVER CO 80202		10. US EPA ID Number 0000000000		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 714 346-1300		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. HM WASTE COMBUSTIBLE LIQUID, N.O.S. (POLYOLIC NAHTH) NA1500, 3011: (3039)(8400716.7200/01L				1	16	0030
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information 0040 00017004 200170 0-000-04-7120 01 IF DELIVERED, RETURN TO CARRIER FOR RECYCLE FACILITY RESPONSE 702-888-4000 0412 CREDIT A: 00000 0: 0: 0:						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Pete Jundz				Signature [Signature]		Date 10/3/95
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature [Signature]		Date 10/3/95
Printed/Typed Name David Cordner				Signature [Signature]		Date 10/3/95
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date
Printed/Typed Name				Signature		Date
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name [Signature]				Signature [Signature]		Date 10/3/95

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 8-30-90

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. COG 980225944	Manifest Document No. 87354	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address PUBLIC SERVICE CO OF COLO 2005 LIME RD PUEBLO CO 81005 ATTN: BOB ARRIAGO 719 544-7365				A. State Manifest Document Number	
4. Generator's Phone (719) 544-7365				B. State Generator's ID	
5. Transporter 1 Company Name SAFETY-KLEEN CORP.		6. US EPA ID Number COG 000710639		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 719 544-1338	
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 2841 EAST FOURTH ST PUEBLO, CO 81001		10. US EPA ID Number COG 000710639		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 719 544-1338	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. HM X WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PLIII (D039)(E49&27) 8.7 LBS/GAL			2 DM	33	0039
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information 2545 87614699 587354 8-052-04-7128 01 IF UNDELIVERABLE, RETURN TO GENERATOR FOR RECYCLE EMERGENCY RESPONSE 708-880-4660 24HR. SKDOT# A: 95653 B: C: D:					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name David E. Howatson		Signature [Signature]		Date 11/17/95	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name David Cardenas		Signature [Signature]		Date 11/17/95	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Paulette Keith					
Signature [Signature]		Date 11/17/95			



Public Service®

Public Service
Company of Colorado

Sept. 12, 1997

Comanche Station
2005 Lime Rd.
Pueblo, Co. 81006

Randolph R. Lamdin
U.S. Environmental Protection Agency
999 18th Street, Suite 500
Denver, Co.

Dear Randy,

Enclosed is the information you requested at the closure session yesterday afternoon. You should have already received faxes from Safety Kleen with regard to the original manifests, # 68175 and 87354. I have enclosed hard copies as well for your study.

A copy of the redlined drawing detailing the areas where spill cleanup material is located, is also attached. I did not fax this drawing as the drawing used is too large for faxing, but I felt this size was needed for personnel to be able to clearly tell the location of the cleanup material. Also enclosed is a copy of the Tolling Agreement furnished by Safety Kleen. This agreement is on the back of the invoice dated Aug. 9, 1995 and as their paper is thin for carbons, it is somewhat difficult to read. The reproduction is legible (as much as the original), but due to the original paper thickness, it requires concentration.

The barrel testing will begin next week, as sampling today and "laying out" over the weekend would render the samples invalid.

Let me know the disposition of the regulation discussion we had, after determination has been made. If there are further items needed, to provide clarification, just let me know.

Jay A. McCoy
Environmental Analyst

DIRECTIONS FOR SAFE, EFFECTIVE USE OF THE SAFETY-KLEEN PARTS WASHER UNIT AND SAFETY-KLEEN IMMERSION CLEANER UNIT. READ BEFORE USING.

I. SAFETY-KLEEN PARTS WASHER SOLVENT

Safety-Kleen solvent is a high flash, hydrocarbon solvent suitable for use in degreasing applications.

A. Combustibility

Safety-Kleen solvent is a combustible material. That means it will burn under certain conditions. Your Safety-Kleen parts washer should not be installed where it can be exposed to heat, sparks or open flame; nor should there be any smoking nearby while a Safety-Kleen parts washer is in use.

B. In Case of Fire

Use dry chemicals, foam or carbon dioxide to extinguish flame. The safety fusible link is designed to melt and allow the cover to fall shut and smother any flames.

C. Toxicity

Safety-Kleen solvent is by definition considered only slightly toxic to relatively non-toxic. Avoid inhaling or swallowing the Safety-Kleen solvent and its coming in contact with your skin, face and eyes. If taken internally, spilled in your eyes, inhaled, or upon contact with your skin, face or eyes, follow the instructions below for treatment.

1. Skin contact: Remove contaminated clothing. Wash skin twice with soap and water. If irritation or pain develops or persists, consult a physician.
2. Eyes: Wash with plenty of water. Call a physician immediately.
3. Ingestion: Do not induce vomiting. Call physician immediately. Guard against inhaling solvent into lungs.
4. Inhalation: Avoid breathing solvent vapors. Adequate ventilation should be provided in any area where the Safety-Kleen parts washer is being used.
5. Clothes: If your clothes become saturated with solvent, change clothes immediately. Above all, do not smoke or go near an open flame or sparks while clothes are wet with solvent.

II. USE OF YOUR SAFETY-KLEEN PARTS WASHER

- A. Avoid leaving large parts or tools in your parts washer which might prevent the lid from closing in case of a fire in your place of business.
- B. Avoid leaving solvent soaked rags either in your parts washer, wadded up in front of the unit or in uncovered containers. Do not put a solvent soaked rag in your pocket. It will cause a skin rash at point of contact.
- C. If you use a soaking pan, make certain that its height is less than the sink height and empty it into the sink as soon as you have finished using your parts washer.
- D. Do not let open pans of solvent sit either in the sink or anywhere else around your place of business.
- E. Safety-Kleen cannot accept for reclamation materials other than the solvents originally supplied and the materials removed from the parts cleaned. Therefore, additional solvents or other materials must not be added to the machine. You should note that even small amounts of low flash point materials (such as gasoline) lower the flash point of Safety-Kleen solvent substantially.
- F. If, for any reason, the fusible link should break or fail, call your local Safety-Kleen branch for a replacement. Do not use a cotter key or other device to hold the lid up. The fusible link is cracked each time a Safety-Kleen man services your unit and if the safety link is faulty, it will be replaced. If it breaks between our service periods, call for a replacement immediately.
- G. Do not place extremely heavy objects in one end of the parts washer unit. The parts washer is very stable but an extremely heavy object could result in the washer being tipped if it is bumped, causing the solvent to dump out on your floor.
- H. Any and all solvent spills should immediately be soaked up with absorbent material, such as Safety-Kleen absorbent, and the solvent soaked material should be removed from the shop area. Contact Safety-Kleen for disposal.
- I. Part of Safety-Kleen's service is immediate repair or replacement of your parts washer should there be any failure of any kind. Simply call your local Safety-Kleen man. The number is on the parts washer lid.
- J. Your Safety-Kleen parts washer should be plugged into a grounded outlet. Under no circumstances should a grounding prong be snipped off the plug. Safety-Kleen provides, at no charge, an adapter which permits grounding on two-prong electrical outlets.
- K. Do not remove solvent from your parts washer.

III. SAFETY-KLEEN IMMERSION CLEANER SOLVENT

Immersion Cleaner Solvent is a mixture of aromatic naphtha cleaning solvents and N-Methyl-2-Pyrrolidone, for use in removing varnish, grime and automotive parts such as carburetors, transmissions, etc.

A. Combustibility

Safety-Kleen Immersion Cleaner is a combustible material. That means it will burn under certain conditions. Your Safety-Kleen Immersion Cleaner should not be installed where it can be exposed to heat, sparks or open flame; nor should there be any smoking nearby while a Safety-Kleen Immersion Cleaner unit is in use.

B. In Case of Fire

Use dry chemicals, foam or carbon dioxide to extinguish flame.

C. Toxicity

This solvent contains aromatic 150, N-Methyl-2-Pyrrolidone and Monoethanolamine. DO NOT BREATHE VAPORS! HARMFUL OR FATAL IF SWALLOWED! DO NOT INDUCE VOMITING! CALL A PHYSICIAN IMMEDIATELY. KEEP AWAY FROM EYES! WASH IMMEDIATELY AND COPIOUSLY WITH RUNNING WATER. CALL A PHYSICIAN.

Avoid contact with skin and clothing. If solvent is inadvertently spilled on skin or clothes wash immediately with running water. Remove clothes as quickly as possible and discard.

IV. SAFE USE OF YOUR SAFETY-KLEEN IMMERSION CLEANER

1. Keep away from heat, sparks and flame. Do not place hot parts in solvent.
2. Use only solvent provided. DO NOT ADD OTHER CHEMICALS TO THE CLEANING SOLVENT, INCLUDING BUT NOT LIMITED TO KEROSENE, FUEL OIL, GASOLINE, DETERGENTS, CHLORINATED SOLVENTS OR ANY MATERIAL CONTAINING POLYCHLORINATED BIPHENYLS. The use of any other solvents potentially causes a hazardous condition over which Safety-Kleen has no control.
3. Do not smoke, drink or eat in work area.
4. Use only in well ventilated locations. Avoid repeated and/or prolonged breathing of vapors. Vapors are heavier than air and will collect in low areas.
5. Avoid contact with eyes. Use protective eye wear such as chemical goggles.
6. Avoid contact with skin. Use protective gloves and protective clothing.

Should you desire any further information about our solvent, our service or our company, please do not hesitate to write or call - Phone No. 1-800-669-5740. The Safety-Kleen parts washer is covered under Directive #100-22, issued by the Occupational Safety and Health Administration's Director, Office of Standards, dated February 20, 1973.

RECLAMATION AGREEMENT

Safety-Kleen agrees as part of this machine placement, to collect for reclamation from Customer the used solvent supplied by Safety-Kleen to the machine. Collection of the used solvent shall be on a periodic basis as otherwise provided herein. Safety-Kleen shall reclaim the used solvent for recovery. Safety-Kleen has the capacity and is permitted to accept, store and reclaim the spent solvents described in this agreement. Safety-Kleen and Customer agree that this agreement is intended to comply with the requirements of 40, Code of Federal Regulations, 262.20(e), as amended, and any state regulations which implement said provision. Customer agrees to keep this form on file for 3 years from the date of last service.

ADDITIONAL TERMS AND CONDITIONS

In accordance with the Chemical Waste Handling Agreement by and between Customer and Safety-Kleen, which is incorporated herein by this reference, Customer represents and warrants to Safety-Kleen that the waste materials tendered by Customer under this Service and Sales Acknowledgment (the "Waste Materials"); (i) are accurately and completely described in the Material Survey that was submitted by Customer for such Waste Materials; and (ii) were produced in the same process that produced the waste materials described in said Material Survey. Customer acknowledges and agrees that the Waste Materials shall be handled in accordance with the terms of the Chemical Waste Handling Agreement.

Safety-Kleen agrees to furnish the above service on its equipment, and Customer agrees that all servicing, repair and maintenance of the equipment shall be performed by Safety-Kleen only. All equipment and solvent shall remain the property of Safety-Kleen and shall be returned to Safety-Kleen upon termination of service. Customer agrees to pay for replacement of equipment due to loss or damage.

Customer agrees that it will not mix the solvent provided hereunder with other materials, that it will not introduce any substance into the solvent which is regulated as hazardous waste or which contains polychlorinated biphenyls and that it will not otherwise cause the alteration of the characteristics or components of the solvents.

Customer agrees to indemnify and hold harmless Safety-Kleen, its officers, directors, employees and agents from and against any and all losses, expenses, damages, demands, and claims, based upon any injury, death or damage arising out of Customer's acts or omissions and to pay any and all damages costs and expenses (including reasonable attorneys' fees) in connection therewith. Customer agrees that Safety-Kleen is not responsible for any violation, loss or claim arising from noncompliance with pollution control laws caused by release of solvent to the environment from the unit or resulting from customer handling, including, but not limited to, spills into adjacent waterways, sewer lines or ground water, however caused. Safety-Kleen accepts responsibility for any spill caused by its agents in connection with the installation or servicing of the machine by Safety-Kleen.

Customer agrees that service hereunder will continue until Customer or Safety-Kleen terminate service. The Termination will only be effective after receipt by the non-terminating party of written notice of termination to be received on the greater of 30 days prior to the date of cancellation or the length of the service interval appearing in the Machine Placement section; provided, however, if Customer is a party to a One-Year Service Agreement with Safety-Kleen, Customer shall not have the right to terminate said Contract except as provided in said Contract.

The total due on the invoice is subject to an interest charge of the lesser of 1 1/2% per month (18% per annum) or the maximum rate allowed by law on any unpaid invoices that are not paid within 30 days.

In the event of default, Safety-Kleen shall be entitled to recover costs of collection, including reasonable attorney's fees.

In the event the said solar panel is used as a credit card charge for this transaction set forth on the front of this document, you are authorized to charge the amount of this

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 10 minutes for transporters, and 10 minutes for disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing the burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CO 000185944	Manifest Document No. 08175		2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address PUBLIC SERVICE CO OF COLO 2005 LINE RD PUEBLO CO 81006 ATTN: BOB ARRIAGO 714 346-7866					A. State Manifest Document Number			
4. Generator's Phone (714) 346-7866					B. State Generator's ID			
5. Transporter 1 Company Name SAFETY-KLEEN CORP.			6. US EPA ID Number CO 000716639		C. State Transporter's ID			
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone (714) 344-1338			
9. Designed Facility Name and Site Address SAFETY-KLEEN CORP. 2941 EAST FOURTH ST PUEBLO, CO 81001			10. US EPA ID Number CO 000716639		E. State Transporter's ID			
					F. Transporter's Phone			
					G. State Facility's ID			
					H. Facility's Phone 714 344-1338			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers	13. Total	14. Unit	I. Waste No.
					No.	Quantity	Wt/Vol	
a. <input checked="" type="checkbox"/> HM WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (0039)(ERG27) 6.7 LBS/GAL					1	16	G	0039
b.								
c.								
d.								
J. Additional Descriptions for Materials Listed Above					K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information 9540 86217684 268175 0-002-04-7128 01 IF UNDELIVERABLE, RETURN TO GENERATOR FOR RECYCLE EMERGENCY RESPONSE: 708-868-4666 24HR. SKDOTS A: 95053 B: C: D:								
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.								
Printed/Typed Name Pete Juonak					Signature Pete Juonak		Date Month 10 Day 3 Year 95	
17. Transporter 1 Acknowledgement of Receipt of Materials					Date			
Printed/Typed Name David Cardenas					Signature David Cardenas		Month 10 Day 3 Year 95	
18. Transporter 2 Acknowledgement of Receipt of Materials					Date			
Printed/Typed Name					Signature		Month Day Year	
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.								
Printed/Typed Name Loretta North					Signature Loretta North		Month 10 Day 3 Year 95	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. COD 980285944		Manifest Document No. 87354		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address PUBLIC SERVICE CO OF COLO 2005 LIME RD PUEBLO CO 81006 ATTN: BOB ARRIAGO						A. State Manifest Document Number									
4. Generator's Phone (719) 545-7365						B. State Generator's ID									
5. Transporter 1 Company Name SAFETY-KLEEN CORP.			6. US EPA ID Number COD 000716639			C. State Transporter's ID									
7. Transporter 2 Company Name			8. US EPA ID Number			D. Transporter's Phone 719 544-1338									
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 2841 EAST FOURTH ST PUEBLO, CO 81001			10. US EPA ID Number COD 000716639			E. State Transporter's ID									
						F. Transporter's Phone									
						G. State Facility's ID									
						H. Facility's Phone 719 544-1338									
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No.		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.			
a. WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)NA1993 PGIII (0039)(ERG#27)6.7LBS/GAL						2		33				0039			
b.															
c.															
d.															
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above									
15. Special Handling Instructions and Additional Information 9545 87614699 1587354 8-052-04-7128 01 IF UNDELIVERABLE, RETURN TO GENERATOR FOR RECYCLE EMERGENCY RESPONSE#708-838-4660 24HR. SKDOT# A: 95653 B: C: D:															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.															
Printed/Typed Name David J. Lewatson						Signature David J. Lewatson						Date 11/17/95			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name David Vardenas						Signature David Vardenas		Date 11/17/95	
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name						Signature		Date	
19. Discrepancy Indication Space															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.															
Printed/Typed Name Paulette Koth						Signature Paulette Koth						Date 11/17/95			

C44 T1

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
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Located in Glendale, Colorado

Laboratory Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

April 25, 2008

Ms. Somer Mese
Xcel Energy
Comanche Station
2005 Lime Road
Pueblo, Colorado 81006

Subject: Inspection Report for the April 18, 2008 Compliance Inspection; EPA Identification Number COD980285944

Dear Ms. Mese:

On April 18, 2008, an inspector from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) conducted a compliance inspection at Xcel Energy. No violations were observed on the day of the site visit, therefore the Division will not take any further action regarding the inspection.

Thank you for your cooperation during the inspection. Attached for your files is a copy of the inspection checklist that serves as a report. Please contact me at (303) 692-3307 if you have any questions.

Sincerely,

Kathryn Stewart
Hazardous Waste Compliance Unit

Randy Lamdin, EPA

**SMALL QUANTITY GENERATOR (SQG)
INSPECTOR SELF-CERTIFICATION CHECKLIST**

Company Name: PSCO-dba Excel Energy EPA ID#: COD980285944

Company Street Address: Comanche Station-2005 Lime Road

City: Pueblo State: Co Zip: 81006

Company Contact: Somer Mese Telephone: 719-549-3766

Business Owner: PSCO-dba Excel Energy Owner Telephone: 303-716-2047

Primary Products or Services: Electric plant

Number of Employees: 125 Hours of Operation: 7-3:30 Years at This Location: 35

Today's Date: 4/18/2008 Inspection Type: Random ☒ Non-Responder ☐ Other ☐

INSTRUCTIONS FOR SECTION A

- Mark YES if you are in compliance
- Mark NO if you are out of compliance. If you answer NO, write in the DATE FIXED indicating the date that you corrected or will correct the violation.
- If the question is not applicable write "N/A"

A.	General <i>Checklist Guidance Document pages 1 → 6 and Appendix A and Appendix B</i>	YES	NO	DATE FIXED or N/A
1.	Has your facility determined what wastes generated at your facility are hazardous wastes and which wastes are not hazardous wastes? 6 CCR 1007-3, section 262.11	<input checked="" type="radio"/>	<input type="radio"/>	
2.	Does the physical address at your facility match the address associated with your EPA Identification Number? 6 CCR 1007-3, Part 99 and section 262.12	<input checked="" type="radio"/>	<input type="radio"/>	
3.	Does your facility generate used oil? Used oil is not counted as a hazardous waste but is regulated. (If you answer "No," it is not a violation.) 6 CCR 1007-3, Part 279	<input checked="" type="radio"/>	<input type="radio"/>	N/A
4.	Does your facility generate less than 2200 pounds of hazardous waste and/or less than 2.2 pounds of acutely hazardous waste in every calendar month of the year? 6 CCR 1007-3, section 262.34(d)	<input checked="" type="radio"/>	<input type="radio"/>	
5.	Does your facility have less than about thirty 55-gallon drums (or less than 13,200 pounds) on site at any one time? 6 CCR 1007-3, section 262.34(d)(1)	<input checked="" type="radio"/>	<input type="radio"/>	
6.	Does your facility use a transporter that is authorized to transport hazardous waste? 6 CCR 1007-3, section 262.12(c)	<input checked="" type="radio"/>	<input type="radio"/>	
7.	Does your facility dispose of all hazardous waste through a permitted treatment, storage and disposal facility? This would include such wastes as spent solvent, water treatment sludge, etc. 6 CCR 1007-3, section 100.10 If not, please explain: _____ _____	<input checked="" type="radio"/>	<input type="radio"/>	

**SMALL QUANTITY GENERATOR (SQG)
INSPECTOR SELF-CERTIFICATION CHECKLIST**

A.	General <i>Checklist Guidance Document pages 1 → 6 and Appendix A and Appendix B</i>	YES	NO	DATE FIXED or N/A
8.	Does your facility ensure that no hazardous waste is disposed of on the ground, sanitary sewer, storm drains, bodies of water, or trash? 6 CCR 1007-3, section 100.10	<input checked="" type="radio"/>	<input type="radio"/>	
9.	Does your facility use any hazardous waste tanks? If so, please refer to the <u>Guide to the Colorado Hazardous Waste Regulations</u> , page 30. (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 265.201 and Subpart J of 265	<input type="radio"/>	<input checked="" type="radio"/>	N/A
10.	Does your facility perform any evaporation, compaction, or any other on-site treatment of hazardous waste? (If you answer "No," it is not a violation.) 6 CCR 1007-3, sections 260.10 and 110.10	<input type="radio"/>	<input checked="" type="radio"/>	N/A

INSTRUCTIONS FOR SECTION B

List all hazardous waste generated at your facility in the space provided below. Also indicate if your waste is a universal waste and/or if it is recycled, what waste codes apply, if any, and how much you generate each month. Be sure to write in the quantity of waste and specify whether the quantity is in gallons or pounds.

B.	Waste Stream Description <i>For more information go to the Checklist Guidance Document page 7 and Appendix A for waste codes</i>	Recycled and/or Universal Waste?		Hazardous Waste Code(s) (if applicable).	Approximate Amount Generated Each Month
		Yes	No		
1.	Lead paint debris	<input type="radio"/>	<input checked="" type="radio"/>	D008	420 lbs
2.	Waste paint	<input type="radio"/>	<input checked="" type="radio"/>	F002, F005, D001, F003	100 lbs
3.	Waste mercury	<input type="radio"/>	<input checked="" type="radio"/>	D009	150 lbs
4.	construction debris	<input type="radio"/>	<input checked="" type="radio"/>	D008, D007	10-100lbs
5.	episodic SQG	<input type="radio"/>	<input type="radio"/>		
6.		<input type="radio"/>	<input type="radio"/>		
7.		<input type="radio"/>	<input type="radio"/>		
8.		<input type="radio"/>	<input type="radio"/>		
9.		<input type="radio"/>	<input type="radio"/>		
10.		<input type="radio"/>	<input type="radio"/>		
11.		<input type="radio"/>	<input type="radio"/>		
12.		<input type="radio"/>	<input type="radio"/>		
13.		<input type="radio"/>	<input type="radio"/>		
14.		<input type="radio"/>	<input type="radio"/>		
15.		<input type="radio"/>	<input type="radio"/>		

**SMALL QUANTITY GENERATOR (SQG)
INSPECTOR SELF-CERTIFICATION CHECKLIST**

INSTRUCTIONS FOR SECTIONS C-L

- Mark **YES** if you are in compliance
- Mark **NO** if you are out of compliance. If you answer **NO**, write in the **DATE FIXED** indicating the date that you corrected or will correct the violation.
- If the question is not applicable write "N/A"

C.	Used Oil Management <i>Checklist Guidance Document page 8</i>	YES	NO	DATE FIXED or N/A
1.	Are containers of used oil marked with the words "Used oil"? 6 CCR 1007-3, section 279.22	<input checked="" type="radio"/>	<input type="radio"/>	
2.	Are all used oil spills and releases cleaned up immediately and properly managed? 6 CCR 1007-3, section 279.22	<input checked="" type="radio"/>	<input type="radio"/>	
3.	Has your facility taken measures to prevent the release of used oil to the environment? 6 CCR 1007-3, section 279.22	<input checked="" type="radio"/>	<input type="radio"/>	
4.	Are all containers used to store used oil outside kept closed except when adding or removing waste? 6 CCR 1007-3, section 279.22	<input checked="" type="radio"/>	<input type="radio"/>	

D.	Hazardous Waste Container Management – 180-day (or 270-day) Area <i>Checklist Guidance Document pages 9→ 10</i>	YES	NO	DATE FIXED or N/A
1.	Are all containers used to store hazardous waste labeled with the words "Hazardous Waste"? 6 CCR 1007-3, sections 262.34(a)(3) and 262.34(d)(4)	<input checked="" type="radio"/>	<input type="radio"/>	
2.	Are containers that are used to store hazardous waste labeled with the date when the first drop of hazardous waste is added to the container <u>or</u> the date when the satellite accumulation area container becomes full? 6 CCR 1007-3, sections 262.34(a)(2) and 262.34(d)(4)	<input checked="" type="radio"/>	<input type="radio"/>	
3.	Are all containers used to store hazardous waste in good condition (not rusted, dented, bulging or leaking)? 6 CCR 1007-3, sections 262.34(d)(2) and 265.171	<input checked="" type="radio"/>	<input type="radio"/>	
4.	Are all containers used to store hazardous waste kept closed except when adding or removing waste? 6 CCR 1007-3, sections 262.34(d)(2) and 265.173(a)	<input checked="" type="radio"/>	<input type="radio"/>	
5.	Are all containers used to store hazardous waste inspected at least weekly looking for containers in poor condition and leaks? 6 CCR 1007-3, sections 262.34(d)(2) and 265.174	<input checked="" type="radio"/>	<input type="radio"/>	
6.	Have you determined what wastes can be stored together? (Are incompatible wastes segregated from each other? Are acids and bases stored separately?) 6 CCR 1007-3, sections 262.34(d)(2) and 265.177(c)	<input checked="" type="radio"/>	<input type="radio"/>	
7.	Are containers shipped to an appropriate treatment, storage, and disposal facility (TSD) within 180 days (or 270 days if the TSD is more than 200 miles away)? 6 CCR 1007-3, sections 262.34(d) and 262.34(e)	<input checked="" type="radio"/>	<input type="radio"/>	

**SMALL QUANTITY GENERATOR (SQG)
INSPECTOR SELF-CERTIFICATION CHECKLIST**

E.	Hazardous Waste Container Management – Satellite Accumulation Areas <i>Checklist Guidance Document pages 11 → 12</i>	YES	NO	DATE FIXED or N/A
1.	Do you have satellite accumulation area containers at your facility? (If you answer "No," it is not a violation.)	<input checked="" type="radio"/>	<input type="radio"/>	N/A
2.	Are all containers in satellite accumulation areas properly labeled with the words "Hazardous Waste" or other words that describe the contents of the containers? 6 CCR 1007-3, section 262.34(g)(1)	<input checked="" type="radio"/>	<input type="radio"/>	
3.	Are all containers in a satellite accumulation area managed to meet the requirements of D.3 through D.6, above? 6 CCR 1007-3, section 262.34(g)(1)	<input checked="" type="radio"/>	<input type="radio"/>	
4.	Are all containers in a satellite accumulation area moved to the 180-day area when they are full or when 55 gallons has been accumulated? 6 CCR 1007-3, section 262.34(g)(2)	<input checked="" type="radio"/>	<input type="radio"/>	

F.	Off-Site Shipment of Hazardous Waste <i>Checklist Guidance Document pages 13 → 15</i>	YES	NO	DATE FIXED or N/A
1.	Does your facility have a reclamation agreement with a hazardous waste recycling facility such as Safety-Kleen or Clean Parts? (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 262.20(e)	<input type="radio"/>	<input checked="" type="radio"/>	N/A
2.	Are off-site shipments of hazardous wastes that are not covered by a reclamation agreement accompanied with a hazardous waste manifest? 6 CCR 1007-3, section 262.20	<input checked="" type="radio"/>	<input type="radio"/>	
3.	Are all hazardous waste manifests routinely completed accurately and completely? 6 CCR 1007-3, section 262.20	<input checked="" type="radio"/>	<input type="radio"/>	
4.	Are all hazardous waste manifests retained for 3 years? 6 CCR 1007-3, sections 262.40(a) and 262.44(a)	<input checked="" type="radio"/>	<input type="radio"/>	
5.	Has land disposal restriction (LDR) documentation been completed for each waste stream and for each treatment and storage facility? 6 CCR 1007-3, Part 268 Subpart D	<input checked="" type="radio"/>	<input type="radio"/>	
6.	Are all land disposal restriction documents retained on-site for three years? 6 CCR 1007-3, Part 268.7(a)(8)	<input checked="" type="radio"/>	<input type="radio"/>	
7.	Are signed hazardous waste manifests from the treatment, storage, disposal facilities received within 60 days of waste shipment? 6 CCR 1007-3, sections 262.42(c) and 262.44(b)	<input checked="" type="radio"/>	<input type="radio"/>	
8.	If manifests were not received within 60 days, was the Hazardous Materials and Waste Management Division notified? 6 CCR 1007-3, sections 262.42(c) and 262.44(b)	<input type="radio"/>	<input type="radio"/>	N/A

**SMALL QUANTITY GENERATOR (SQG)
INSPECTOR SELF-CERTIFICATION CHECKLIST**

G.	Hazardous Waste Training and Emergency Response <i>Checklist Guidance Document pages 16 → 18</i>	YES	NO	DATE FIXED or N/A
1.	Are all personnel involved with hazardous waste management trained so that they are thoroughly familiar with proper hazardous waste handling and emergency response procedures? 6 CCR 1007-3, section 262.34(d)(5)(iii)	<input checked="" type="radio"/>	<input type="radio"/>	
2.	Has an emergency coordinator been established for the facility and is he/she familiar with his/her responsibilities in that position? 6 CCR 1007-3, section 262.34(d)(5)(i)	<input checked="" type="radio"/>	<input type="radio"/>	
3.	Has emergency response information been posted by the telephone? 6 CCR 1007-3, section 262.34(d)(5)(ii)	<input checked="" type="radio"/>	<input type="radio"/>	
4.	Have you determined what emergency equipment is appropriate for your facility? 6 CCR 1007-3, sections 262.34(d)(4) and 265.32	<input checked="" type="radio"/>	<input type="radio"/>	
5.	Is adequate aisle space provided around the containers of hazardous waste to allow for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? 6 CCR 1007-3, sections 262.34(d)(4) and 265.35	<input checked="" type="radio"/>	<input type="radio"/>	
6.	Have emergency response arrangements been made with the local response organizations (fire department and hospitals) that are likely to respond in an emergency situation? 6 CCR 1007-3, sections 262.34(d)(4) and 265.37	<input checked="" type="radio"/>	<input type="radio"/>	
7.	Is the facility operated in a manner that minimizes the potential for releases of hazardous waste? 6 CCR 1007-3, sections 262.34(d)(4) and 265.31(a)	<input checked="" type="radio"/>	<input type="radio"/>	
8.	What fire protection district is the facility in? Write the Name in here: <u>Pueblo Rural Fire District</u>			

H.	On-Site Hazardous Waste Treatment Land Disposal Restriction Treatment <i>Checklist Guidance Document pages 19 → 20</i>	YES	NO	DATE FIXED or N/A
1.	Do you know what land disposal restriction treatment standards are? (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 268.7(a)(5)	<input checked="" type="radio"/>	<input type="radio"/>	N/A
2.	Is your facility treating hazardous waste on site to make it more suitable for recycling or reclamation or to reduce its volume or toxicity? (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 260.10	<input type="radio"/>	<input checked="" type="radio"/>	N/A
3.	Is your facility treating hazardous waste in tanks, or containers, or in a containment building? (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 268.7(a)(5)	<input type="radio"/>	<input checked="" type="radio"/>	N/A
4.	Is your facility treating any hazardous waste to meet a land disposal restriction treatment standard? (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 268.7(a)(5)	<input type="radio"/>	<input checked="" type="radio"/>	N/A
5.	If you are treating hazardous waste to meet land disposal restriction standards, do you have a written waste analysis plan on site? 6 CCR 1007-3, section 268.7(a)(5)	<input type="radio"/>	<input checked="" type="radio"/>	

**SMALL QUANTITY GENERATOR (SQG)
INSPECTOR SELF-CERTIFICATION CHECKLIST**

I.	On-Site Hazardous Waste Treatment Permit Requirements and Exclusions <i>Checklist Guidance Document pages 21</i>	YES	NO	DATE FIXED or N/A
1.	Is your facility treating hazardous waste under the Permit By Rule provisions of the Colorado Hazardous Waste Regulations? (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 100.21(d)	<input checked="" type="radio"/>	<input type="radio"/>	N/A
2.	Is your facility treating a reactive hazardous waste? (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 100.21(d)(6)	<input type="radio"/>	<input checked="" type="radio"/>	N/A
3.	Is your facility heating hazardous waste to treat it? (If you answer "No," it is not a violation.) 6 CCR 1007-3, section 100.21(d)(5)	<input type="radio"/>	<input checked="" type="radio"/>	N/A

J.	On-Site Hazardous Waste Treatment Waste Water Treatment <i>Checklist Guidance Document pages 22</i>	YES	NO	DATE FIXED or N/A
1.	Does your facility treat any hazardous waste in a Waste Water Treatment Unit? (If you answer "No," it is not a violation.) 6 CCR 1007-3, sections 260.10 and 100.10(a)	<input type="radio"/>	<input type="radio"/>	N/A
2.	If you are treating hazardous waste in a Waste Water Treatment Unit, have you obtained a discharge permit or a zero-discharge permit? 6 CCR 1007-3, sections 260.10 and 100.10(a)	<input type="radio"/>	<input type="radio"/>	N/A
3.	Does the Waste Water Treatment Unit meet the definition of a tank or tank system? 6 CCR 1007-3, sections 260.10 and 100.10(a)	<input type="radio"/>	<input type="radio"/>	N/A

K.	Air Pollution Control <i>Checklist Guidance Document page 23</i>	YES	NO	DATE FIXED or N/A
1.	Has your facility filed for an Air Pollution Emissions Notice (APEN) or been issued an air permit? (If you answer "No," it is not a violation.)	<input checked="" type="radio"/>	<input type="radio"/>	N/A

L.	Pollution Prevention <i>Checklist Guidance Document page 23</i>	YES	NO	DATE FIXED or N/A
1.	In the last 12 months, has your facility taken one or more actions to reduce toxics, conserve water, or energy? (If you answer "No," it is not a violation.) Write in the projects you have implemented _____ _____ _____ _____ _____	<input type="radio"/>	<input checked="" type="radio"/>	N/A

SMALL QUANTITY GENERATOR (SQG)
INSPECTOR SELF-CERTIFICATION CHECKLIST

Inspector Comments:

April 18, 2008

Facility Name: PSCO-DBA Xcel Energy

Inspector: Kathryn Stewart

HW Transporter: Veolia ES

HW TSD: Veolia, Henderson, Co

PSCO-Xcel Energy was a small quantity generator on the day of the site visit. No violations were noted.

See inspection checklist for coverage areas.

Kathryn Stewart

Inspector

04/18/2008

Date Inspected (mm/dd/yyyy)

CLEAR FORM

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
 4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, Co 80246-1530
 (303) 692-3300

Commanche Station **Notice of Inspection**

Facility Name PSCO-D/B/A X-cel		EPA ID # CO0980285944	Date 4-18-08
Street 2005 Lime Road		Inspection Arranged Prior to Inspection () YES () NO	Hour In: 10:00
City Pueblo	County Pueblo	Zip 81006	Hour Out: 11:00
Facility Representatives Somer Mese		Titles Env. Analyst	Telephone # 719-549-3766
		Agency: () State () Oversight () Joint	

CURRENT NOTIFICATION(S) ☐ LQG, ☒ SQG, ☐ Exempt, ☐ LDF, ☐ TSF, ☐ Transporter, ☐ Non-Notifier, ☐ Transfer facility or ☐ Other ☒ To Change Status; Facility must send Letter or Revised Notification.

Comments:

No violations

Contact Lynette Myers at 303-692-3477 if you are interested in learning more about the environmental leadership program.

Assistance Delivered During Inspection (for internal use - check ALL that apply):

Compliance Assistance:	Pollution Prevention:	Current Waste Minimization:
<input checked="" type="checkbox"/> Generator Handbook	<input type="checkbox"/> Guidance/Referral	<input type="checkbox"/> Product Substitution
<input type="checkbox"/> Other guidance documents	<input type="checkbox"/> Field Assistance	<input type="checkbox"/> Distillation of solvents on site
<input type="checkbox"/> Change in generator status <input type="checkbox"/> downward <input type="checkbox"/> upward		<input type="checkbox"/> Elementary Neutralization
		<input type="checkbox"/> Other

Samples, Documents, Plans, and / or Photos Collected	3.
1.	
2.	4.

State personnel will review the facts established by this inspection. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector:

Assisting Inspector(s) and Multimedia Participant(s)

Signature of Facility Representative

